

HILL RIVKINS LLP

Attorneys for Respondents

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HARREN & PARTNER SHIP MANAGEMENT :

de MEXICO S.A.P.I. and TYPHOON :

OFFSHORE S.A.P.I. de CV, :

Petitioners, :

-against- :

AMERICAN BUREAU OF SHIPPING, ABS :

GROUP OF COMPANIES, INC. ABS :

CONSULTING, LTD., ABSG CONSULTING :

INC., :

Respondents. :

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Index No.: 1:21-cv-5361 (LGS)

**NOTICE OF MOTION TO
COMPEL ARBITRATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Charles M. Henderson, III, dated January 31, 2022, the Exhibits thereto, the Parties' Joint Stipulation, and all pleadings and prior proceedings had herein, Respondent/Cross Petitioner American Bureau of Shipping hereby moves this Court, before the Honorable Lorna G. Schofield, U.S.D.J., for an order pursuant to 9 U.S.C. §§ 4 and/or 206, compelling Petitioners Harren & Partner Ship Management de Mexico S.A.P.I. and Typhoon Offshore S.A.P.I. de CV, to arbitrate the claims set out in the Counterpetition, and for such other and further relief as the Court may deem just and proper under the circumstances.

DATED: January 31, 2022
New York, NY

Respectfully submitted,

HILL RIVKINS LLP

By: /s/ John J. Sullivan

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**ATTORNEYS FOR
RESPONDENTS, AMERICAN
BUREAU OF SHIPPING, ABS
GROUP OF COMPANIES, INC.,
ABS CONSULTING LTD., AND
ABSG CONSULTING INC.**